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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THE SHAKESPEARE GLOBE TRUST

Plaintiff,

v.

**KULTUR INTERNATIONAL FILMS, INC.,
KULTUR INTERNATIONAL FILMS, LTD.
and DENNIS HEDLUND**

Defendant.

Case No. 18-cv-_____

**COMPLAINT
AND JURY DEMAND**

Plaintiff The Shakespeare Globe Trust (“**The Globe**” or “**Plaintiff**”), by and through its attorneys, White & Case LLP, as and for its Complaint against defendant Kultur International Films, Inc. and Kultur International Films, Ltd. (collectively “**Defendant Corporations**”) and Dennis Hedlund (“**Defendant Hedlund**”) (collectively “**Defendants**,” alleges as follows:

NATURE OF THE ACTION

1. This is an action for copyright infringement under the Copyright Act, 17 U.S.C. §§ 101 to 513 and trademark infringement and unfair competition brought pursuant to Sections 32(1) and 43(a) of the Lanham Act, 15 U.S.C. §§ 1114(1) and 1125(a), N.J.S.A. 56:3-13.16 and 13.20 and the common law of the State of New Jersey.

THE PARTIES

2. The Globe is a corporation organized and existing under the laws of the United Kingdom, having a principal place of business at 21 New Globe Walk, London, SE1 9DT.

3. Upon information and belief, Defendant Kultur International Films, Inc., is a foreign for-profit corporation, with a principal business address registered with the Secretary of State of the State of New Jersey, and which Defendants provided to the Globe, at 195 Highway 36, West Long Branch, New Jersey 07764 and a listed address on their primary website of PO Box 755, Forked River, New Jersey, 08731, and operating within this district.

4. Upon information and belief, Defendant Kultur International Films, Ltd., is an alias, intentionally or unintentionally, for Defendant Kultur International Films, Inc., with a principal business address registered with the Secretary of State of the State, and which Defendants provided to the Globe, of New Jersey, at 195 Highway 36, West Long Branch, New Jersey 07764 and a listed address on their primary website of PO Box 755, Forked River, New Jersey, 08731, and operating within this district.

5. Upon information and belief that Defendant Hedlund is a resident of Pennsylvania residing at 6464 Old Carversville Road, Carvesville, Pennsylvania 18913, Bucks County, with pervasive and ongoing contacts with, and creating substantial connections to, the State of New Jersey.

JURISDICTION AND VENUE

6. This Court has subject matter jurisdiction over this action pursuant to 17 U.S.C. § 411(a), 28 U.S.C. §§ 1331 (actions arising under the laws of the United States), 1338(a) and (b) (actions arising under an Act of Congress relating to copyrights and

trademarks and any civil action asserting a claim of unfair competition when joined with a substantial and related claim under the copyright, patent, plant variety protection or trademark laws), 1367 (supplemental jurisdiction under state statutory and common law for claims related to the federal claims), and 15 U.S.C. § 1121(a) (actions arising under the Lanham Act, without regard to the amount in controversy or to diversity or lack of diversity of citizenship between the parties).

7. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(a). Defendants reside in this judicial district, are transacting and doing business within this district, are committing the acts complained of herein within this district, or have otherwise directed their illegal conduct complained of herein to this district, causing damage to Plaintiff in this district.

8. Personal jurisdiction is proper over Defendants. Defendant Corporations are registered and/or authorized to conduct business in the State of New Jersey. Additionally, upon information and belief, Defendant Corporations have their principal place of business in the State of New Jersey. Defendant Hedlund is the founder and chairman of Defendant Corporations and has and continues to personally and willfully direct the past and ongoing actions of Defendant Corporations, including the unlawful conduct set forth in this complaint. Thereby, Defendant Hedlund has pervasive and ongoing contacts with, and is creating substantial connections to, the State of New Jersey.

9. The unlawful conduct complained of herein has caused, and continues to cause, injury to The Globe within this district.

10. Defendants regularly conduct, solicit, or transact business in this district, by, among other things, offering and selling products in this district, including the

infringing products alleged herein, to persons located within this district, through (i) a warehouse for distribution located in this district, and (ii) the www.kulturvideo.com website (“**Kulturvideo.com**”).

11. Defendants regularly and systematically direct electronic activity into the State of New Jersey through their fully interactive website, Kulturvideo.com. Kulturvideo.com offers for sale, and actually sells, the infringing works, alleged herein.

12. Defendants, through the aforementioned conduct, demonstrate a manifest intent to engage in business within this district. Upon information and belief, Defendants derive substantial revenue in interstate and/or international commerce from business conducted in this district.

THE GLOBE

13. The original Globe Theatre was built in 1599 and became the home of William Shakespeare, a partial owner, and the Lord Chamberlain’s Men, Shakespeare’s acting company. Shakespeare’s plays graced the Globe’s stage from 1599 until 1613 when, during a performance of Henry VIII, the theatre caught on fire and burned to the ground. The theatre was quickly rebuilt and remained the home of Lord Chamberlain’s Men, eventually becoming the King’s Men in 1603, until its eventual closure under the England Puritan administration in 1642.

14. American actor, director, and producer Sam Wanamaker founded The Shakespeare Globe Trust in 1970 and dedicated the trust to the reconstruction of the theatre and the creation of an educational center and permanent exhibition. The new Globe Theatre was opened to the public by Her Majesty the Queen in June 1997.

15. Currently, The Globe is a registered charity whose primary focus is to promote and celebrate William Shakespeare’s transformative impact on the world by

advancing education in the dramatic arts and by encouraging and stimulating public appreciation and understanding of the dramatic art in all its forms.

16. Since 1997, The Globe has owned and operated the Globe Theatre, which stages works of William Shakespeare and his contemporaries. The Globe conducts recording of these original performances and their diverse program of work is known and enjoyed around the world.

THE GLOBE COPYRIGHTS

17. The Globe owns copyrights in each of its original recorded stage performances. The Globe owns copyright registrations for following works (collectively, the “**Globe Works**”) which are original works of authorship protected under the copyright law of the United States. The following is a list of the Globe Works.



TITLE	REGISTRATION NO.	DATE/PLACE OF PUBLICATION	REGISTRATION DATE
Shakespeare’s Globe: All’s Well That Ends Well	PA0001987741	September 26, 2012 (UK)	November 19, 2015
Shakespeare’s Globe: Much Ado About Nothing	PA0001987746	October 10, 2012 (UK)	November 19, 2015
Shakespeare’s Globe: The Merry Wives of Windsor	PA0001987749	June 27, 2011 (UK)	November 19, 2015
Shakespeare’s Globe: Henry IV – Part 1	PA0001987743	July 25, 2011 (UK)	November 19, 2015
Shakespeare’s Globe: Henry IV – Part 2	PA0001987744	August 7, 2011 (UK)	November 19, 2015

Shakespeare's Globe: Henry VIII	PA0001987745	September 13, 2011 (UK)	November 19, 2015
Shakespeare's Globe: Twelfth Night	PA0001987740	June 11, 2013 (UK)	November 18, 2015
Shakespeare's Globe: Henry V	PA0001987748	June 3, 2013 (UK)	November 18, 2015
Shakespeare's Globe: The Taming of the Shrew	PA0001987750	July 26, 2013 (UK)	November 18, 2015
Shakespeare's Globe: Doctor Faustus – Marlowe	PA002110151	September 15, 2012 (UK)	March 6, 2018
Shakespeare's Globe: The Tempest	PA002110201	September 15, 2014 (UK)	March 6, 2018
Shakespeare's Globe: Macbeth	PA002110206	September 15, 2014 (UK)	March 6, 2018
Shakespeare's Globe: A Mid- Summer Night's Dream	PA002110204	September 15, 2014 (UK)	March 6, 2018

THE GLOBE TRADEMARKS

18. The Globe owns, among others, the following United States Trademark Registrations (collectively, the “**Globe Trademarks**”):

MARK	REGISTRATION NO.	REGISTRATION DATE	CLASS	OWNER
SHAKESPEARE'S GLOBE	2,648,425	November 12, 2002	14	SHAKESPEARE GLOBE TRUST, THE (United Kingdom)

				
SHAKESPEARE'S GLOBE 	2,440,022	April 3, 2001	16, 21, 25, 35, 36, 41	SHAKESPEARE GLOBE TRUST, THE (United Kingdom)

19. The Globe continuously has used the Globe Trademarks in commerce in the United States as of the first use dates set forth in the registrations.

20. The Globe filed the SHAKESPEARE'S GLOBE, Registration No. 2,440,022, mark with the United States Patent and Trademark Office ("USPTO") on April 29, 1999 (the "**Shakespeare's Globe Mark**"). The USPTO registered the Shakespeare's Globe Mark on April 3, 2001.

21. The Shakespeare's Globe Mark is in Class 16 (covering, among other things, paper goods and printed matter) and Class 41 (covering, among other things, education and entertainment services). Class 41 explicitly includes "education and entertainment services in the nature of theatrical and musical productions."

22. The Globe has expended a substantial amount of money and effort in advertising and promoting the Globe Trademarks, including using the mark on merchandising, press releases, and other promotional material.

23. The Globe Trademarks are famous and inherently distinctive. The Globe Trademarks serve to identify and indicate the source of The Globe's products to the

consuming public and to distinguish The Globe's products and services from those of others.

24. The Globe also owns common law rights in The Globe Trademarks in New Jersey and throughout the United States. The Globe Trademarks identify The Globe as the source of its products and are famous in the State of New Jersey.

DEFENDANTS' UNLAWFUL ACTIVITIES

25. The Globe entered into a distribution agreement with the Defendant Corporations entitled the Kultur International Films Joint Venture Agreement, dated May 16, 2011 ("**License**").

26. Pursuant to the License, Defendant Corporations received an exclusive license to manufacture, distribute, sell, license, rent, and exploit certain Globe Works in the United States and Canada during the term of the License.

27. Section 3 of the License provides:

The term of this agreement and of the rights, licenses and privileges granted to the [Defendant Corporations] hereunder shall commence on the date of execution of this agreement and continue for a period of four (4) years. The Agreement will automatically renew for a one (1) year term on a year-to-year basis unless one of the parties notifies the other party in writing of its intention to terminate the Agreement sixty (60) days prior to the expiration date of the Agreement.

28. Pursuant to Section 3, the original term of the License continued for a period of four (4) years, expiring May 16, 2015. Thereafter, the License automatically renewed for two (2) successive one (1) year periods, lasting from May 16, 2015, to May 16, 2016 for the first term, and would have lasted from May 16, 2016, to May 16, 2017, for the second term.

29. In accordance with Section 3 of the license, The Globe gave notice of termination of the License on March 16, 2017. The License terminated sixty (60) days later on May 15, 2017.

30. Pursuant to the License, Defendant Corporations had the right, on a non-exclusive basis, to sell off Defendants' remaining inventory of copies over a six (6) month sell-off period immediately following the termination of the License. The six (6) month sell-off period ended November 15, 2017.

31. Upon information and belief, Defendant Hedlund is the founder and chairman of Defendant Corporations and solely, personally, and willfully directs the conduct of Defendant Corporations.

32. Upon information and belief, Mr. Rupert Hull is an employee of Defendants ("**Hull**").

33. On October 27, 2017, The Globe, through its counsel, sent a letter to Defendants stating again that The Globe had exercised its notice of termination and that, after the sell-off period, the Defendants could no longer use, trade, manufacture, or sell the Globe Works.

34. On November 29, 2017, The Globe, through its counsel, notified Defendants that the sell-off period pursuant to the License had expired, and that Defendants no longer had a license to the Globe Works.

35. In an email dated December 14, 2017, from Hull to The Globe's counsel, Hull informed that Defendant Hedlund was "gravely ill in hospital for major surgery."

36. During January through March of 2018 The Globe, through its counsel, sent various communications to Defendants, stating that the License was no longer in effect.

37. On March 29, 2018, The Globe sent a cease and desist letter to Defendants demanding that Defendants cease and desist selling the Globe Works and to desist from otherwise infringing copyrighted materials owned by The Globe. A true and correct copy of the cease and desist letter is attached hereto as Exhibit A.

38. On April 23, 2018, The Globe, through its counsel, had a telephone conversation with Defendant Hedlund during which conversation The Globe demanded that Defendants stop all infringing activities. Defendant Hedlund responded that “we are not going to stop selling the titles” and The Globe will need to “take this to a higher authority.” Hedlund threatened that should The Globe “make him angry,” he would “sell [the Globe Works] at \$2.99 and really bring down the market.”

39. Defendants continue to offer for sale, market, and/or sell the Globe Works, bearing the Shakespeare’s Globe Mark, in New Jersey and throughout the United States on its website Kulturvideo.com. Exhibit B evidences such infringing activity.

40. Further, Defendants continue to offer for sale, market, and/or sell the Globe Works, bearing the Shakespeare’s Globe Mark, in New Jersey and throughout the United States via listings on third party vendor sites, including: (i) Amazon; (ii) Barnes & Noble; (iii) Walmart; and (iv) Target. Exhibit C evidences such infringing activity.

41. Moreover, Defendants continue to display excerpts from the Globe Works, bearing the Shakespeare’s Globe Mark, on its online YouTube Channel “Kultur Films,” located at <https://www.youtube.com/user/KulturFilms>, wherein it directs users, in New

Jersey and throughout the United States, to purchase the Globe Works via KulturVideo.com. Exhibit D evidences such infringing activity.

42. Defendants' unauthorized sale, distribution, and public performances of the Globe Works are willful.

43. These actions by Defendants have damaged or are likely to damage the reputation and goodwill of The Globe.

44. As a result of Defendants' actions there is substantial controversy between the Defendant and The Globe.

45. The controversy is sufficiently immediate and real, and Defendants have threatened The Globe with great harm by undercutting the price of the Globe Works to willfully "bring down the market" for the Globe Works as retribution for The Globe's protection and enforcement of its intellectual property rights.

46. The Globe is entitled to injunctive and monetary relief for Defendants' willful, intentional, and purposeful use and exploitation of the Globe Works for Defendant's financial benefit and gain with full knowledge that such use constitutes infringement of The Globe's copyright rights.

47. The Globe is entitled to injunctive and monetary relief for the Defendants' willful, intentional and purposeful use and exploitation of the Globe Works bearing Shakespeare's Globe Mark for their own financial benefit and gain with full knowledge that such use constitutes infringement of The Globe's trademark rights.

COUNT I

(Copyright Infringement)

48. The Globe re-alleges and incorporates by reference the allegations set forth in the foregoing paragraphs of the Complaint.

49. The Globe Works are original works of authorship, and the copyrights in those works are valid and subsisting.

50. The Globe Works are registered with the U.S. Copyright Office.

51. The Globe is the exclusive owner of the copyrights in the Globe Works and of the registrations for the Globe Works.

52. Defendants, without authorization of The Globe, have distributed and publicly performed the Globe Works in violation of The Globe's exclusive rights in the Globe Works.

53. Through their conduct, Defendants have infringed the Globe Works in violation of the U.S. Copyright Act, 17 U.S.C. §§ 106 and 501.

54. Defendants' acts of infringement are and have been willful, intentional, and purposeful.

55. The Globe is entitled to recover its actual damages and profits attributable to the infringement of the Globe Works, in an amount to be proven at trial in accordance with 17 U.S.C. § 504(b).

56. Alternatively, The Globe is entitled to recover statutory damages in an amount of up to \$150,000 per work infringed, for Defendants' willful infringement.

57. As a direct result of the Defendants' infringement of the Globe Copyright Registrations, The Globe is entitled to its attorneys' fees in accordance with 17 U.S.C. § 505.

58. By reason of such infringement, Defendants have caused, and unless restrained and enjoined will continue to cause, irreparable injury to The Globe for which there is no adequate remedy at law, in an amount not thus far determined.

59. Defendants' infringement of the Globe Works intentionally and wrongfully enriches Defendants, and deliberately and willfully injures The Globe in wanton disregard of The Globe's rights.

60. Defendants have threatened to take actions to destroy the market for the Globe Copyright Registrations. The Globe is therefore entitled to any and all injunctive relief pursuant to 17 U.S.C. § 502 restraining Defendants, their agents, employees, and all persons acting in concert with Defendants from engaging in such further unlawful conduct.

COUNT II

(Federal Trademark Infringement)

61. The Globe re-alleges and incorporates by reference the allegations set forth in the foregoing paragraphs of the Complaint.

62. The Globe is the sole and exclusive owner of valid and subsisting United States trademark registrations in the Globe Trademarks.

63. The Globe Trademarks are valid and legally protectable.

64. The Defendants have and continue to use the Globe Trademarks without authorization from the Globe.

65. The Defendants have and continue to offer for sale products bearing the Globe Trademarks.

66. The acts of Defendants complained of herein are likely to cause confusion, mistake, or deception as to origin, sponsorship, or approval and therefore constitute federal trademark infringement in violation of 15 U.S.C. § 1114(1).

67. By reason of Defendants' bad faith and willful infringement, The Globe is entitled to recover actual damages, treble damages, an accounting for Defendants' profits,

attorneys' fees, and the costs of this litigation pursuant to 15 U.S.C. § 1117 and injunctive relief pursuant to 15 U.S.C. § 1116.

COUNT III

(Federal Unfair Competition)

68. The Globe re-alleges and incorporates by reference the allegations set forth in the foregoing paragraphs of the Complaint.

69. The Globe is the sole and exclusive owner of valid and subsisting United States trademark registrations in the Globe Trademarks.

70. The Globe Trademarks are valid and legally protectable.

71. The Defendants have and continue to use the Globe Trademarks without authorization from the Globe.

72. The Defendants have and continue to offer for sale products bearing the Globe Trademarks.

73. The acts of Defendants complained of herein constitute unfair competition in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a). The Globe is entitled to recover actual and treble damages, attorneys' fees, and the costs of this litigation pursuant to 15 U.S.C. § 1117 and injunctive relief pursuant to 15 U.S.C. § 1116.

COUNT IV

(Trademark Infringement and Unfair Competition
under New Jersey Trade Names, Trademarks, and Unfair Practices
Statute §§ 56:3-13.16 and 56:4-1)

74. The Globe re-alleges and incorporates by reference the allegations set forth in the foregoing paragraphs of the Complaint.

75. Defendants have violated, infringed and diluted The Globe's trademark rights in Shakespeare's Globe Mark. Defendants have used, without the consent of the

owner, a mark that is a reproduction, counterfeit, copy, or colorable imitation of Shakespeare's Globe Mark in connection with the sale of goods and services in New Jersey. Defendants' use of Shakespeare's Globe Mark was in a manner likely to cause confusion, deception, or mistake as to the source of the goods and services and Defendants have used the same on labels, signs, and in advertising in violation of the law of New Jersey.

76. The Globe is entitled to the remedies provided at N.J.S.A. 56:3-13.20 and 56:4-2 for Defendants' actions constituting trademark infringement and unfair competition respectively.

COUNT V

(Unfair Competition under the Common Law of New Jersey)

77. The Globe re-alleges and incorporates by reference the allegations set forth in the foregoing paragraphs of the Complaint.

78. By engaging in the foregoing acts, Defendants have knowingly engaged in unlawful passing off and competed unfairly with The Globe in violation of the common law of unfair competition in the State of New Jersey.

79. The Globe is entitled to recover actual and punitive damages for Defendants' unfair competition.

JURY DEMAND

80. The Globe respectfully requests that this case be tried before a jury.

PRAYER FOR RELIEF

WHEREFORE, The Globe respectfully demands that this Court enter judgment against Defendants as follows:

A. That Defendants and their officers, directors, partners, employees, agents, servants and attorneys and those persons in active concert or participation with them, be preliminarily and permanently enjoined from reproducing, distributing, and preparing derivative works based on, publicly displaying, or publicly performing the Globe Works;

B. That Defendants, and their officers, agents, servants, employees, attorneys, and all those persons in active concert or participation with any of them, be preliminarily and permanently enjoined from using the Globe Trademarks, and any other mark that is confusingly similar to the Globe Trademarks or dilutive thereof, and from unfairly competing with The Globe in any manner whatsoever;

C. That The Globe recover from Defendants their actual damages;

D. That the Globe recover from Defendants the profits of Defendants attributable to the infringement;

E. That the Globe recover from Defendants statutory damages of \$150,000 per work infringed;

F. That The Globe recover treble damages from Defendants;

G. That The Globe recover punitive damages from Defendants;

H. That The Globe have a recovery from Defendants of any other damages sustained by The Globe resulting from Defendants' infringing activities;

I. That The Globe have a recovery from Defendants of the costs of this action and The Globe's reasonable attorneys' fees;

J. That Defendants be ordered to return to The Globe all remaining inventory of the Globe Works; and

K. That The Globe have all other and further relief as the Court may deem just and proper under the circumstances.

Dated: November 19, 2018

Respectfully Submitted,

/s/ Stephen R. Buckingham
Stephen R. Buckingham
LOWENSTEIN SANDLER LLP
One Lowenstein Drive
Roseland, New Jersey 07068
(973) 597-2500
sbuckingham@lowenstein.com
Attorneys for Plaintiff

Of counsel:

David M. Tennant
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701 Thirteenth Street, NW
Washington, DC 20005-3807

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues triable by a jury.

NOTICE OF OTHER ACTIONS PURSUANT TO L. CIV. R. 11.2

The undersigned hereby certifies that the matter in controversy is not the subject of any other action or proceeding in any court or of a pending arbitration proceeding.

/s/ Stephen R. Buckingham

Stephen R. Buckingham
LOWENSTEIN SANDLER, LLP
One Lowenstein Drive
Roseland, N.J. 07068
Tel: (973) 597-2500

EXHIBIT A

White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005-3807
T +1 202 626 3600

whitecase.com

March 29, 2018

VIA UPS & EMAIL

Mr. Dennis Hedlund
Mr. Rupert Hull
Mr. Gene Mirgorodsky
Kultur International Films
195 Highway 36
West Long Branch, New Jersey 07764

Re: Infringement of The Shakespeare's Globe Trust's Copyrights

Dear Messrs Hedlund, Hull and Mirgorodsky,

We are contacting you on behalf of our client the Shakespeare's Globe Trust ("The Globe"). The Globe is a charity whose primary focus is to promote the power of performance, cultivate intellectual curiosity, excite learning, and celebrate William Shakespeare's transformative impact on the world by conducting radical theatrical experiments. The Globe owns and operates the Shakespeare's Globe Theatre that stages works of William Shakespeare and his contemporaries. The Globe conducts tapings of these performances and their diverse program of work is enjoyed throughout the world.

As you are no doubt aware, The Globe is the author and distributor of taped performances at the Shakespeare's Globe Theatre, including the following works (collectively referred to as the "Works"):

- All's Well That Ends Well
- Much Ado About Nothing
- Doctor Faustus-Marlowe
- The Merry Wives of Windsor
- Henry IV-Part 1
- Henry IV-Part 2
- Henry VIII
- Twelfth Night
- Henry V
- The Taming of the Shrew
- The Tempest
- Macbeth
- A Midsummer Night's Dream

Mr. Dennis Hedlund
Mr. Rupert Hull
Mr. Gene Mirgordosky

The Globe has exclusive rights under United States Copyrights in the Works and the Works are of substantial commercial value to The Globe. The Globe has registered the copyrights in many of the above Works with the United States Copyright Office, otherwise registration is pending.

Indeed you are aware of The Globe's copyrights to the Works because you previously distributed the Works within the United States and Canada under a since terminated license, the Kultur International Films Joint Venture Agreement, dated May 16, 2011 (the "License"). The Globe gave notice that it intended to terminate the License on March 15, 2017, and the License thus terminated May 15, 2017. The sell-off period under Section 3 of the License expired November 15, 2017, and there has been no written agreement between the parties amending or extending the sell-off period, as required by Section 16 of the License.

It has come to our attention that Kultur continues to offer and distribute the Works through its website beyond the expiration of the sell-off period. We have enclosed as Exhibit A printouts from the www.kulturvideo.com website demonstrating Kultur's unauthorized use. This use constitutes copyright infringement under 17 U.S.C. § 501 and may subject Kultur to a claim for damages under 17 U.S.C. § 504(b). Moreover, the willful and flagrant nature of Kultur's misappropriation subjects Kultur to liability for increased damages and attorneys' fees.

The Globe takes this matter seriously, and is committed to protecting its copyrighted artistic creations. I write in an effort to reach a quick and amicable resolution of this matter without the need for legal action. Accordingly, we must insist that Kultur immediately:

1. cease and desist selling the Globe's Works;
2. provide The Globe with an accounting of all revenue received by Kultur in connection with the sale of The Globe's Works from November 16, 2017 (after expiration of the sell-off period) to the present; and
3. desist from infringing any other copyrighted materials owned by The Globe.

If we do not receive a written response indicating Kultur's compliance with the above demands by Monday, April 16, 2018, we will be forced to take such further action as may be necessary to protect our client's rights.

Thank you for your prompt attention to this matter. Nothing in this letter waives or relinquishes any of The Globe's rights or remedies, all of which it hereby expressly reserves.

Sincerely,



Ajita Shukla

T +1 202 637 6243
E ajita.shukla@whitecase.com

cc: Mr. David M. Tennant (White & Case, LLP)
Ms. Chui-Yee Cheung (The Globe)
Mr. Ian Dixon (The Globe)
Enclosures



(/shoppingcart.asp)



SHOPPING CART
0 ITEM(S)

WISH LIST (/WISHLIST.ASP)

MY ACCOUNT (/MYACCOUNT.ASP)

CHECKOUT (/SHOPPINGCART.ASP)

HOME (/)

BLU-RAY (BLU-RAY-OPERA-BALLET-DOCUMENTARY-ON-BLU-RAY-S/1.HTM)

HOLIDAY RELEASES (/SEARCHRESULTS.ASP?CAT=58)

JOIN OUR MAILING LIST (/SEARCHRESULTS.ASP?CAT=130)

SEARCH...



You are here: Home (<http://www.kulturvideo.com/>) > Search for "The Shakespeare Globe" (? searching=Y&sort=3&search=The+Shakespeare+Globe&show=16)

We found 17 results matching your criteria.

No exact matches found for The Shakesperes Globe. Result for The Shakespeare Globe (17)

Sort By: Newest

Search Within 16 per page

Page 1

of 2

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CATEGORIES

Art (/Art-DVDs-Documentary-Artists-Photography-on-DVD-s/4.htm)

Ballet (/Ballet-DVDs-Blu-Ray-Performance-Documentary-on-DVD-s/3.htm)

Blu-Ray (/Blu-Ray-Opera-Ballet-Documentary-on-Blu-ray-s/1.htm)

Classical Music (/Classical-



(<http://www.kulturvideo.com/Twelfth-Night-Shakespeare-s-Globe-Theatre-p/d4996.htm>)



(<http://www.kulturvideo.com/Henry-V-Shakespeare-s-Globe-Theatre-p/d4997.htm>)
Our Price: \$29.99



(<http://www.kulturvideo.com/The-Taming-of-the-Shrew-Shakespeare-s-Globe-Theatre-p/d4998.htm>)



(<http://www.kulturvideo.com/Macbeth-Shakespeare-s-Globe-Theatre-p/d5000.htm>)

DVD and Blu-ray: Kultur Films: Online Shopping for CDs, Ballet, History, Dance, Documentary, Performing Arts
 Classical Music & Classical
 Music-DVDs-Documentary-
 Performance-Bernstein-s/2.htm)

Collector's Sets (/DVD-
 Blu-ray-Sets-Documentary-
 Performance-Art-Music-
 s/55.htm)

Comedy (/Comedy-DVDs-
 Classical-TV-DVDs-s/48.htm)

Dance (/Dance-DVDs-
 Documentary-Performance-
 s/52.htm)

Film & TV (/Theatre-Films-
 Dvd-Blu-Ray-s/8.htm)

History (/History-DVDs-Blu-
 ray-Documentary-Ancient-
 Medieval-Art-s/5.htm)

Holiday (/Holiday-DVDs-
 Nutcracker-Classical-Music-
 Ballet-Opera-s/58.htm)

Kids & Seniors (/Kultur-com-
 Kids-Dvds-s/60.htm)


Literature (/Literature-DVDs-
 Shakespeare-Salinger-Book-of-
 Kells-etc-s/59.htm)

Music (/Popular-Music-
 DVDs-Country-Jazz-Pop-Rock-
 Irish-DVDs-s/7.htm)

Opera (/Opera-DVDs-Blu-
 ray-Performance-Documentary-
 Recital-s/6.htm)


Theatre (/category-
 s/120.htm)

Theatre-p/d4996.htm)
 Our Price: \$29.99

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 ProductCode=D4996)




(http://www.kulturvideo.com/A-Mid-Summer-Night-s-Dream-Shakespeare-s-Globe-T-p/d5001.htm)
 A Mid Summer Night's
 Dream - Shakespeare's
 Globe Theatre
 (http://www.kulturvideo.
 com/A-Mid-Summer-
 Night-s-Dream-
 Shakespeare-s-Globe-T-
 p/d5001.htm)
 Our Price: \$29.99

 **ADD TO CART**
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(http://www.kulturvideo.com/All-s-Well-That-Ends-Well-p/d4787.htm)
 All's Well That Ends Well
 - Shakespeare's Globe
 Theatre
 (http://www.kulturvideo.
 com/All-s-Well-That-
 Ends-Well-p/d4787.htm)
 Our Price: \$29.99

 **ADD TO CART**
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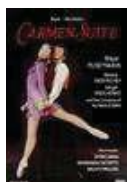
(http://www.kulturvideo.com/Troilus-Cressida-p/d4374.htm)
 Road to The Globe:
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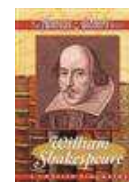
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 Nothing - Shakespeare's
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EXHIBIT B

The Shakespeare Globe Trust Works Sold by Kultur, KULTUR VIDEO, www.kulturvideo.com (search "Shakespeare's Globe Theatre") (last visited Oct. 16, 2018).

The screenshot displays the Kultur Video website interface. At the top, the Kultur logo is on the left, and navigation links for 'WISH LIST', 'MY ACCOUNT', and 'CHECKOUT' are on the right. A shopping cart icon indicates '0 ITEM(S)'. Below the navigation bar, a search bar contains the text 'SEARCH...' and a magnifying glass icon. The main content area shows search results for 'the shakespeare s globe'. A sidebar on the left features a 'FREE SHIPPING' banner and a 'CREATE A FREE ACCOUNT NOW' button. Below the banner, a 'CATEGORIES' list includes Art, Ballet, Blu-Ray, Classical Music, Collector's Sets, Comedy, Dance, Film & TV, History, Holiday, and Kids & Seniors. The search results section displays 17 items, with the first row showing four items: Twelfth Night, Henry V, The Taming of the Shrew, and Macbeth. Each item includes a cover image, title, price, and an 'ADD TO CART' button. The second row shows four more items: A Midsummer Night's Dream, Road to The Globe, Doctor Faustus, and Much Ado About Nothing. The bottom of the page shows the 'NEXT PAGE' button.

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> WISH LIST > MY ACCOUNT > CHECKOUT

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0 ITEM(S)

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SEARCH...

You are here: Home > Search for "the shakespeare s globe"

We found 17 results matching your criteria.

Sort By: Newest Search Within 16 per page Page 1 of 2

NEXT PAGE →

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- ▶ Art
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- ▶ Blu-Ray
- ▶ Classical Music
- ▶ Collector's Sets
- ▶ Comedy
- ▶ Dance
- ▶ Film & TV
- ▶ History
- ▶ Holiday
- ▶ Kids & Seniors

Twelfth Night - Shakespeare's Globe Theatre
Our Price: \$29.99
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Our Price: \$29.99
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Macbeth - Shakespeare's Globe Theatre
Our Price: \$29.99
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A Midsummer Night's Dream - Shakespeare's Globe Theatre
Our Price: \$29.99
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Road to The Globe: Troilus & Cressida
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Doctor Faustus - Marlowe - Shakespeare's Globe Theatre
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Genre
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Performing Arts

Format
☐ DVD

Movie & TV Show Release Decade
☐ 2010 & Newer
☐ 2000 - 2009
☐ 1990 - 1999
☐ 1980 - 1989
☐ 1970 - 1979
☐ 1960 - 1969
☐ Up to 1960

Avg. Customer Review
☒ 4 stars & Up
☐ 3 stars & Up
☐ 2 stars & Up
☐ 1 star & Up

Price
 \$15 to \$20
 Over \$20

Condition
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 New
 Used

Availability
☒ Include Out of Stock

A Midsummer Night's Dream: Shakespeare's Globe Theatre On-Screen 2015 | NR

DVD
 \$19.17 (4 used & new offers)

Audio CD
 \$51.47 (3 used & new offers)

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★★★★☆ 43

Starring: -
 Directed by: Dominic Dromgoole
 Runtime: 2 hrs 52 mins

Amazon's Choice

The Tempest - Shakespeare's Globe Theatre on - Screen 2015 | NR

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★★★★☆ 26

Starring: Roger Allam, Jason Baughman, et al.
 Directed by: Jeremy Herrin
 Runtime: 2 hrs 42 mins

Twelfth Night - Shakespeare's Globe Theatre On Screen 2015 | NR

DVD 2 DVD Set
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★★★★☆ 73

Starring: Stephen Fry, Mark Rylance, et al.
 Directed by: Tim Carroll
 Runtime: 2 hrs 55 mins

Macbeth - Shakespeare's Globe Theatre On-Screen 2015 | NR

DVD 2 DVD set
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★★★★☆ 14

Starring: Joseph Millson, Samantha Spiro, et al.
 Directed by: Eve Best
 Runtime: 2 hrs 27 mins

Henry V - Shakespeare's Globe Theatre On Screen 2015 | NR

★★★★☆ 14

Starring: Joseph Millson, Samantha Spiro, et al.
 Directed by: Eve Best
 Runtime: 2 hrs 27 mins

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Twelfth Night: Shakespeare's Globe Theatre On Screen

DVD
Stephen Fry (Actor), Mark Rylance (Actor), Tim Carroll (Director) | Rated: NR
★★★★★ 71 customer reviews

DVD
\$19.59

Additional DVD options	Edition	Discs	Price	New from	Used from
DVD (Apr 28, 2015)	—	2	\$19.59	\$17.49	\$17.50

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Gift-wrap available.

☒ Yes, I want FREE Two-Day Shipping with Amazon Prime

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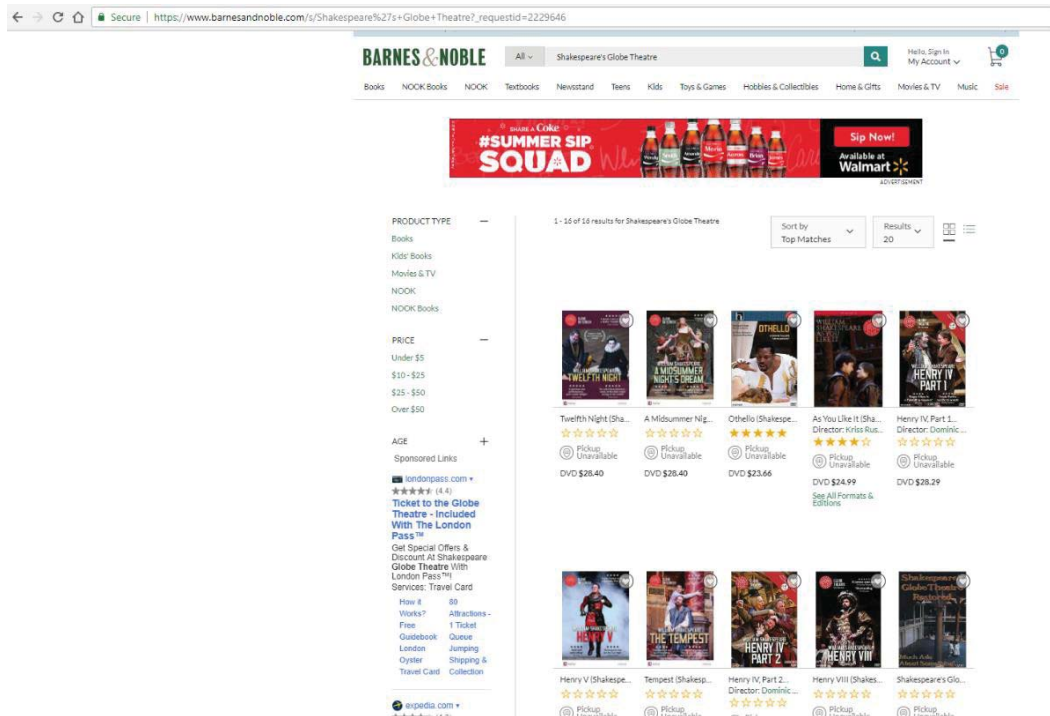
Want it Thursday, June 21? Order within 10 hrs 4 mins and choose Two-Day Shipping at checkout. Details

Deliver to Washington 20001

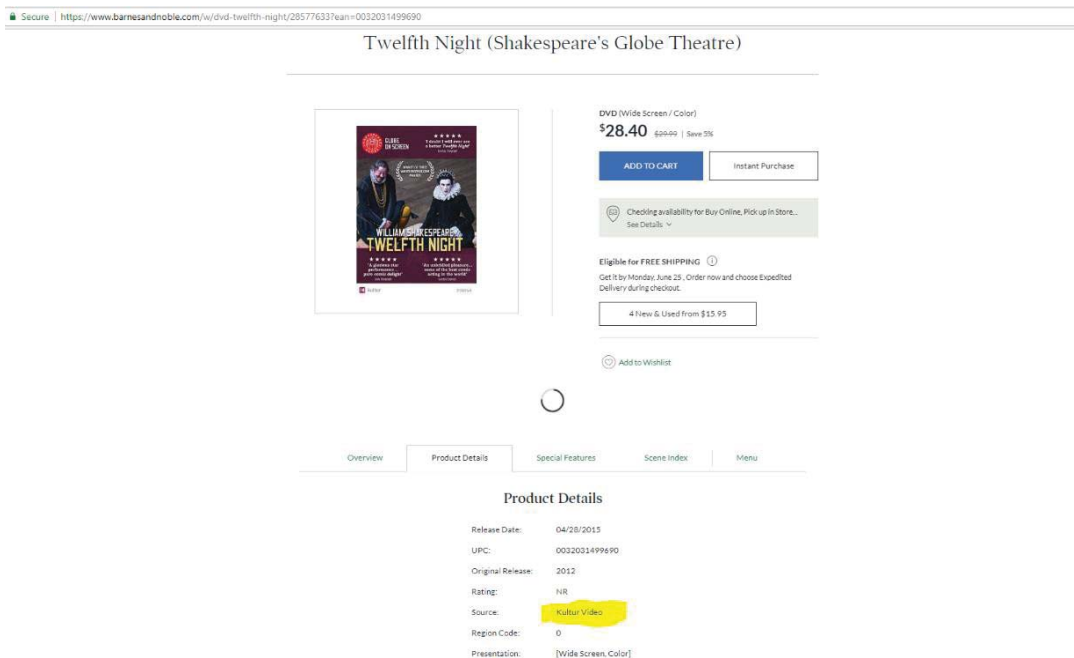
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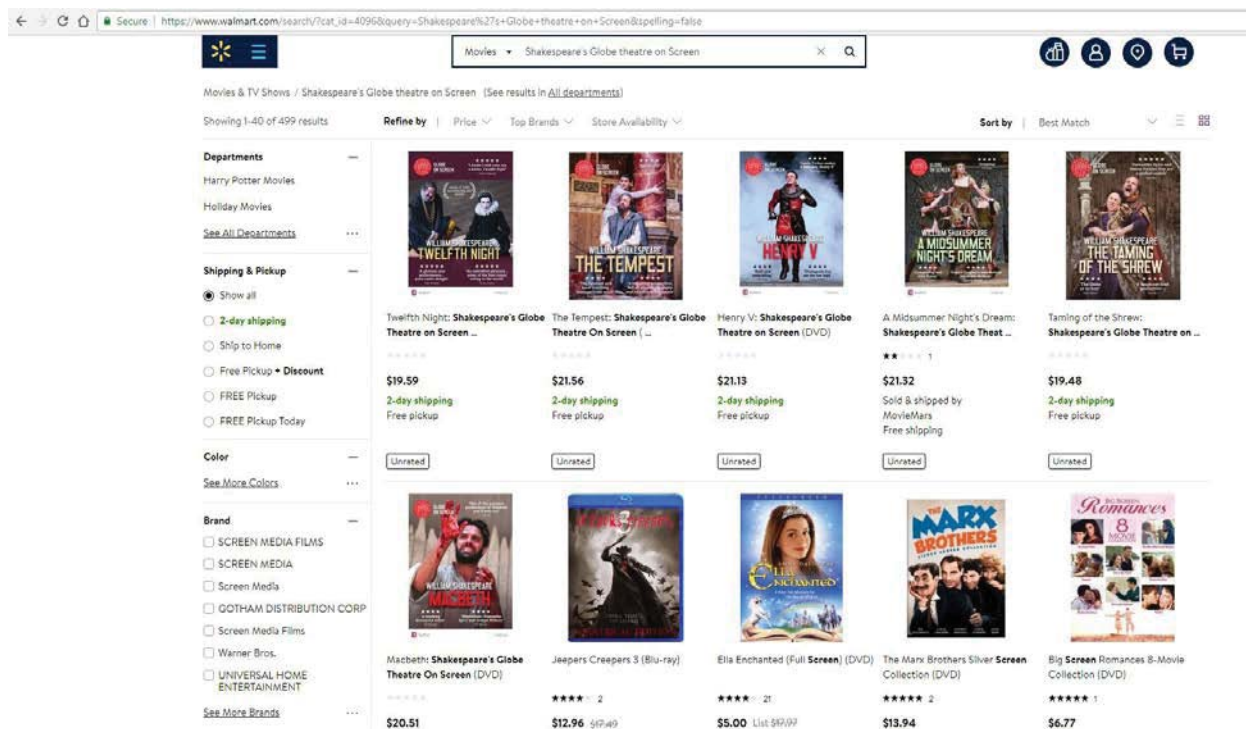
Example of Kultur's Listings on amazon.com, AMAZON, <https://www.amazon.com/Twelfth-Night-Shakespeares-Theatre-Screen/dp/B00T40NVIK/> (last visited Oct. 15, 2018).



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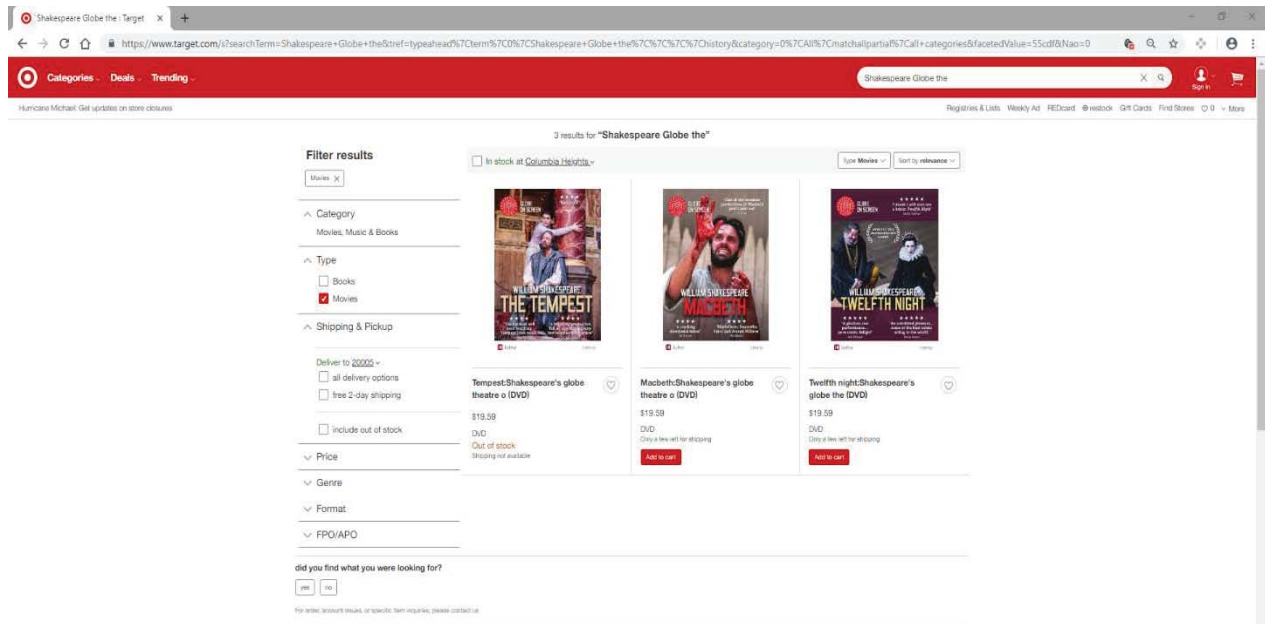
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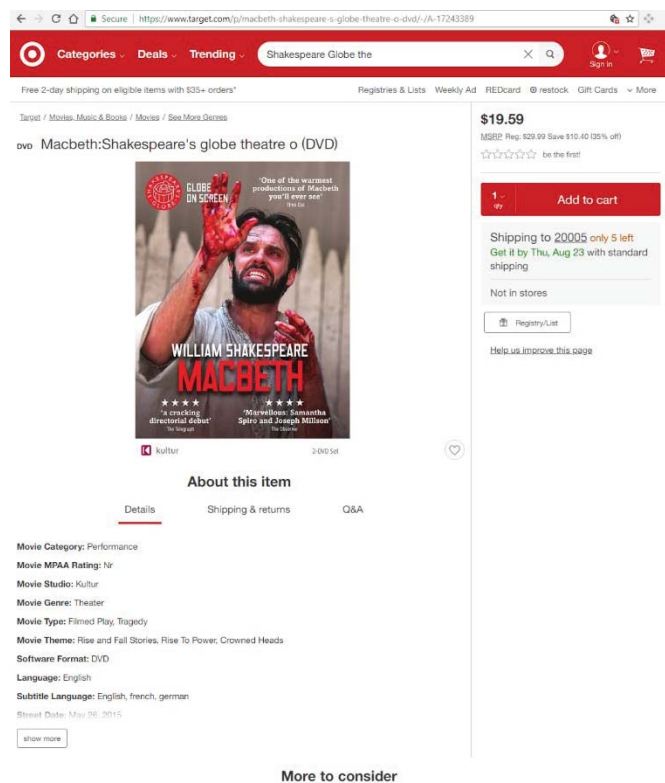
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


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Much Ado About Nothing - Shakespeare's Globe Theatre

9,134 views

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 Published on Feb 19, 2013

Claudio loves Hero and Hero Claudio and nothing seems capable of tearing them apart. Claudio's friend Benedick loves Beatrice and Beatrice Benedick, but (because neither will admit it) nothing seems capable of bringing them together. Only the intrigues of a resentful prince force Benedick to prove his love for Beatrice - by killing his best friend.

Driven along by a romance all the more charming for being unacknowledged, Much Ado About Nothing is a miracle of comic and dramatic suspense and gives us, in the bantering Beatrice and Benedick, one of Shakespeare's wittiest, most lovable pair of lovers.


Featuring Eve Best ('sublime' The Times) as Beatrice and Charles Edwards (gives a superb performance' The Daily Telegraph) as Benedick.

Please visit <http://www.kultur.com/Much-Ado-About-...> for more information on this program

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